
October 20, 2025

Kira Gillespie
Deputy Pardon Attorney
Office of the Pardon Attorney
U.S. Department of Justice
950 Pennsylvania Avenue NW
Washington, DC 20530

Docket No. OAG 191

Ms. Gillespie:

The National Association of School Nurses (NASN), representing nearly 19,000 school nurses across the country, urges the Department of Justice (DOJ) to finalize a rule that prioritizes public safety, as Congress intended when it created the process for restoring federal firearms rights.

To properly evaluate whether an applicant poses a threat, the final rule must include thorough background checks, fingerprinting, and an in-depth review of the applicant's behavior and reputation. A process that lacks these elements cannot adequately assess risk or protect the public.

While technology may assist in reviewing applications, it must not replace meaningful, human-led review. Restoration decisions are too important to be left solely to Artificial Intelligence (AI).

We are also concerned by two areas in the proposed rule. First, the allowance for "extraordinary circumstances" to override presumptive disqualifications could undermine the rule's intent. The final rule should clearly define what qualifies as extraordinary and explicitly rule out inappropriate factors like political ties or campaign donations. Second, the list of disqualifying offenses should be expanded to include evidence-backed categories such as felony hate crimes and DUI offenses, which have known links to violent re-offense.

Gun violence is the leading cause of death for America's youth. As healthcare professionals responsible for the well-being of children, NASN urges the DOJ to adopt a final rule that fully reflects the seriousness of that reality and places public safety at the center of every decision.

Best regards,
Lynn Nelson, MSN, RN, NCSN

Lynn Nelson
President
National Association of School Nurses